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9 UNITED STATES BANKRUPTCY COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 [Sacramento Division]

12 In re:

13 GREGORY G. SMITH, M.D.,
14 A PROFESSIONAL
CORPORATION,
Debtor.

Case No. 20-24783-A-11
Docket Control No. MHK-4

Continued Hearing

Date: April 20, 2021

Time: 1:30 p.m.

Dept: A (Courtroom 28)

Hon. Fredrick E. Clement

15 SECOND JOINT STATUS REPORT FOR
16 DEBTOR IN POSSESSION'S OBJECTION TO PROOF OF CLAIM
NO. 1 FILED BY MEMORY REHABILITATION MED. GROUP

17 Gregory G. Smith, M.D., a Professional Corporation, as debtor in possession (the
18 "Debtor") and Memory Rehabilitation Medical Group (the "Claimant") hereby submit
19 their Second Joint Status Report for the above-referenced contested matter.

20 I. PROCEDURAL POSTURE

21 1. At the initial hearing on December 21, 2020, the parties argued their
22 positions, and the court continued the hearing to February 22, 2021, thereby permitting
23 the parties to serve discovery.

24 2. The Debtor served on the Claimant a set of interrogatories and a request
25 for production of documents. Responses were due on or about February 10, 2021, and
26 although counsel granted a modest extension of time to respond, the extension has
27 lapsed. To date, the Claimant has provided only an unverified and partial response, and
28 the Claimant's counsel has awaited the Claimant's full response.

1 3. Meanwhile, the Debtor has requested a second extension of time to file a
2 Plan of Reorganization in the case, and the request is to be heard on April 6, 2021.
3 Because a Plan has yet to be filed, resolution of this objection to claim is not particularly
4 time-sensitive, and given the modest amount in controversy, the Debtor, if possible,
5 wishes to avoid any unnecessary expense associated with proceedings to compel a
6 response to the pending discovery.

7 **II. SUGGESTIONS FOR BRIEFING SCHEDULE**

8 4. The parties suggest that a continued hearing be set on the Objection for
9 May 17, 2021 at 1:30 p.m., at which time a final hearing could be set.

10 Dated: 4-2-21

REYNOLDS LAW CORPORATION

11
12 By: 

Stephen M. Reynolds
Attorneys for the Claimant

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14
15 Dated: April 2, 2021

MEEGAN, HANSCHU & KASSENBRICK

16
17 By: 

Anthony Asebedo
Attorneys for the Debtor